

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268

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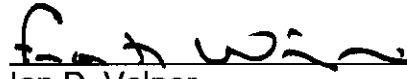
Mailing Online Services

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Docket No. MC98-1

SECOND SET OF INTERROGATORIES OF PITNEY BOWES INC.
TO USPS WITNESS GARVEY
(PB/USPS-T1-7-14)

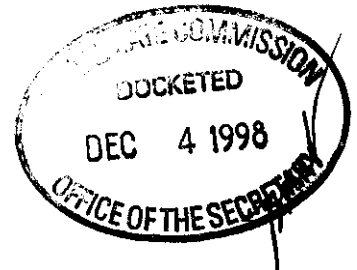
Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, Pitney Bowes Inc. ("PB") hereby propounds the attached interrogatories and requests for the production of documents. The instructions for responding contained in the First Set of Interrogatories of Pitney Bowes Inc. to USPS Witness Garvey are incorporated by reference.

Respectfully submitted,



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- PB/USPS-T1-7 Library Reference 16 refers (at Page 3) to three "internal lists." For each of them, please respond to each of the following questions:
- (a) Is the list prepared by or for the Postal Service in the ordinary course of business?
- (b) If not, (i) why and by whom was the list prepared; (ii) how was the list assembled; (iii) what was the cost to the Postal Service of preparing, purchasing or renting the list; and (iv) what is the annual cost (if any) to the Postal Service of maintaining it?
- (c) If your answer to subpart (a) is yes, (i) what is the source of the list; (ii) to what use is the list customarily put; and (iii) what is the annual cost of maintaining the list?
- PB/USPS-T1-8 One of the line items for what is described as the "total budget for this postal office online marketing plan" discloses it is for a full year of expense, whereas the other two line items say that they are for the market test only. Why is money budgeted for a period longer than the market test is scheduled to last?
- PB/USPS-T1-9 The Library Reference 16 discussion of direct mail makes reference to "all five cities." What are the five cities?
- PB/USPS-T1-10 Two of the "advertising elements" disclosed at Page 4 of Library Reference 16 are said to be "in development." Please report on the state of development.
- PB/USPS-T1-11 Please supply the "Measurement" data referred to at Library Reference 16, Page 3.
- PB/USPS-T1-12 Library Reference 16, Page 2 refers to six media to be used for advertising Post Office Online. What percentage of the advertising budget is allocated to each medium for the market test?
- PB/USPS-T1-13 Does the budget cover only advertising for three months of that market test? Quantify any additional amounts that will be spent if the market test continues longer than three months.

PB/USPS-T1-14 Describe whether any of the media to be used is intended/anticipated to target Mailing Online users more than users of other Post Office Online services.

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served this document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

DATE: December 4, 1998



N. Frank Wiggins